

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

This Document Relates TO:

Case No. 3:15-cv-07658-MAS-LHG

Master No. 3:15-cv-07658-
MAS-LHG

CLASS ACTION

Judge Michael A. Shipp

Magistrate Judge Lois H.
Goodman

Special Master Hon. Dennis M.
Cavanaugh, U.S.D.J. (Ret.)

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION
OF ROBERT W. CLORE**

PLEASE TAKE NOTICE that on June 1, 2020 at 9:00 am, or as soon thereafter as counsel may be heard, Objector Cathy Lochridge shall move under Local Civ. R. 101.1(c) for an Order permitting the *pro hac vice* admission of Robert W. Clore.

PLEASE TAKE FURTHER NOTICE that Objector Cathy Lochridge will rely upon the Certifications of Jerome Froelich and Robert W. Clore, including Exhibit A to Mr. Clore's certification, in support of this motion.¹

PLEASE TAKE FURTHER NOTICE that Class Counsel and Defendants' counsel have not consented to this Motion. No brief is necessary as this Motion does not raise novel or complex issues of law. It is respectfully requested that the Court rule upon this Motion without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

A proposed form of Order is attached.

DATED: May 6, 2020

Respectfully submitted,

/s/ Jerome J. Froelich, Jr.
Jerome J. Froelich, Jr.
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Counsel for Cathy Lochridge

¹ It should be noted that in addition to seeking *pro hac vice* admission before this Court, Mr. Clore is in the process of applying for admission to practice in the State of New Jersey, and if admitted, intends to apply for general admission to the District of New Jersey.